



BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
DOCUMENT CONTROL

WILLIAM A. MUNDELL
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COMMISSIONER
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COMMISSIONER

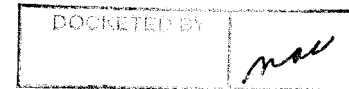
Docket No. W-01032B-00-1043

IN THE MATTER OF THE APPLICATION OF
CITIZENS COMMUNICATIONS COMPANY,
AGUA FRIA DIVISION, FOR (1) AN EXTENSION
OF THE AREA COVERED BY ITS EXISTING
CERTIFICATE OF CONFINEMENT AND
NECESSITY, (2) APPROVAL OF THE
CATERPILLAR PROPERTY
WATER/WASTEWATER AGREEMENT, (3)
APPROVAL OF THE TARIFF FOR THE WATER
FACILITIES HOOK-UP FEE, (4) APPROVAL OF
THE TARIFF FOR GENERAL NON-POTABLE
WATER SERVICE, AND (5) APPROVAL OF
RULE NO. 12 APPLICABLE TO NON-POTABLE
WATER SERVICE.

Arizona Corporation Commission

DOCKETED

OCT 12 2001



Docket No. SW-03454A-00-1043

IN THE MATTER OF THE APPLICATION OF
CITIZENS WATER SERVICES COMPANY OF
ARIZONA FOR (1) AN EXTENSION OF THE
AREA COVERED BY ITS EXISTING
CERTIFICATE OF CONFINEMENT AND
NECESSITY FOR WASTEWATER SERVICE, (2)
APPROVAL OF THE CATERPILLAR PROPERTY
WATER/WASTEWATER AGREEMENT, AND (3)
APPROVAL OF THE TARIFF FOR THE
WASTEWATER FACILITIES HOOK-UP FEE.

RUCO'S APPLICATION TO INTERVENE

I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the
Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in
the above-captioned proceeding.

1 II.

2 RUCO was established by the enactment of Arizona Revised Statutes, Section 40-461,
3 *et seq.*, for the purpose of representing residential utility consumers in matters before the
4 Commission concerning regulated public service corporations.

5 III.

6 Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of
7 RUCO may do the following:

8 Prepare and present briefs, arguments, proposed rates or orders
9 and intervene or appear on behalf of residential utility consumers
10 before hearing officers and the Corporation Commission as a party
11 in interest and also participate as a party in interest pursuant to
12 Section 40-254 in proceedings relating to rate making or rate
13 design and involving public service corporations.

14 IV.

15 The Commission has directed its Hearing Division to schedule further proceeding to
16 explore the scope of the Commission's authority. The residential consumers of Citizens
17 Communications Company, Agua Fria Division, Citizens Water Services Company of Arizona,
18 and other utility companies throughout the state, will be directly and substantially affected by a
19 Decision or Order of the Commission in this matter, therefore, it is necessary and proper that
20 RUCO intervene in the proceeding.

21 V.

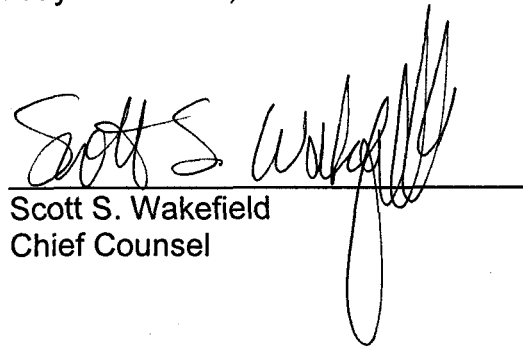
22 In order to fulfill its statutory obligation to protect the residential utility consumers of this
23 State, RUCO must thoroughly examine the materials presented by the Company, and must
24 cross-examine witnesses appearing on behalf of the Company and any other parties.
Additionally, RUCO may present testimony and exhibits of its own in any hearings conducted
by the Commission in this matter.

1 VI.

2 The name, mailing address, and telephone number of the person upon whom service of
3 all documents is to be made is,

4 Scott S. Wakefield, Chief Counsel
5 Residential Utility Consumer Office
6 2828 North Central Avenue, Suite 1200
Phoenix, Arizona 85004
(602) 279-5659 ext. 349

7 RESPECTFULLY SUBMITTED this 12th day of October, 2001.

8
9 
10 Scott S. Wakefield
11 Chief Counsel
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15

16 AN ORIGINAL AND TEN COPIES
17 of the foregoing filed this 12th day
of October, 2001 with:

18 Docket Control
19 Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

20 COPIES of the foregoing hand delivered/
21 mailed this 12th day of October, 2001 to:

22 Lyn Farmer
23 Chief Administrative Law Judge
Arizona Corporation Commission
1200 West Washington
24 Phoenix, Arizona 85007

1 Christopher Kempley, Chief Counsel
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8 2575 East Camelback Road
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9
10 By Linda Reeves
11 Linda Reeves

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